

UNITED STATES DISTRICT COURT

Northern District of New York

6th Judicial Division

_____)	
JANE DOE, JOHN DOE)	
)	Case No.3:24-cv-274 (MAD/ML)
)	
Plaintiffs)	
)	
-against-)	
)	[PROPOSED] DEFAULT
)	JUDGMENT
)	
JONATHAN REES aka GREG ELLIS)	
aka JOHNATHAN REES aka JONNY REES)	
aka JACOB LORENZO)	
)	
Defendant)	
_____)	

PROPOSED DEFAULT JUDGMENT UNDER

FED. R. CIV. P. 55(b)(2) AND N.D.N.Y. L.R. 55.2

Defendant JONATHAN REES aka GREG ELLIS having failed to plead or otherwise defend in this action, Second Amended Complaint, **ECF 56** and his default having been entered, **ECF 66**;

Now, upon application of JANE DOE and JOHN DOE and affidavits and exhibits demonstrating that defendant is liable, Default Judgment should be entered. Defendant is not an infant or incompetent person or in the military service of the United States.

In their Motion, Plaintiffs have shown, through the well pleaded allegations in the Second Amended Complaint and other evidence gathered in this case, that Defendant is liable for the following:

(i) Intentional Infliction of Emotional Distress; (ii) Sexual Harassment, Gender Discrimination and Hostile Work Environment; (iii) Violation of Civil Rights; (iv) Tortious Inference with Contract/Prospective Economic Advantage; (v) Intentional Inference with Prospective Business Relations; (vi) Forced Labor; (vii) Forgery; (viii) Identity Theft.

IT IS HEREBY ORDERED that Defendant is liable to Plaintiffs for the injuries caused by Defendant's abuse and harassment campaign, as plead in the above mentioned causes of action plead in the Second Amended Complaint.

IT IS FURTHER ORDERED that Defendant is PERMANENTLY ENJOINED FROM directly or indirectly ever again posting or otherwise using personal and private content, photographs or videos of John Doe, Jane Doe and her non party minor children, as well as posting or otherwise using any personal private content, other photographs or videos of Plaintiffs and from disclosing Plaintiffs names publicly.

IT IS FURTHER ORDERED THAT Defendant shall attempt to remove exclusive websites set up about Plaintiffs, and remove from any websites or social media platforms, all references to Plaintiffs or instruct the persons who control those websites or social media accounts to remove their names, private content, videos, photographs from those websites and social media platforms.

IT IS FURTHER ORDERED THAT Defendant is PERMANENTLY ENJOINED FROM directly or indirectly contacting Plaintiffs in any way.

IT IS FURTHER ORDERED THAT Defendant shall file with this Court and serve upon Plaintiffs within fifteen days after issuance of this injunction, a report in writing, under oath, setting forth in detail the manner and form in which Defendant has complied with the injunction.

The Court shall retain jurisdiction to enforce this Default Judgment and Permanent Injunction. If Defendant violates any terms of this Default Judgment and Permanent Injunction, Plaintiffs shall have the right to reopen this action upon motion or application. If the action is reopened, Plaintiffs shall not be precluded from pursuing any remedies it may have against Defendant and shall be entitled to recover any of its costs and attorneys' fees for further prosecution of this action.

IT IS HEREBY ORDERED that Plaintiffs Order to Show Cause Why Default Judgment Should Not Be Entered is GRANTED in its entirety, that Defendant is deemed in default and that this Default Judgment is entered against Defendant.

Accordingly, this Court ORDERS that:

The matter be set down for an inquest on the _____ day of _____, 2025, to assess Plaintiffs damages.

Dated: 05/13/2025

By the Court,

United States District Judge